IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

In re:)	Chapter 11
)	
Blackjewel, L.L.C., et al.,)	Case No. 19-bk-30289
)	
	Debtors. ¹)	(Jointly Administered)

NOTICE OF FILING OF AMENDED PROPOSED ORDER AND ASSET PURCHASE AGREEMENT APPROVING THE SALE OF PAX ASSETS TO CONTURA ENERGY, INC.

PLEASE TAKE NOTICE that, on August 22, 2019, Blackjewel, L.L.C., and its affiliated debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") in the above-captioned chapter 11 cases, filed the *Motion of Debtors for Entry of Order Approving the Sale of Pax Assets to Contura Energy, Inc. Free and Clear of Liens, Claims and Encumbrances* [Docket No. 835] (the "<u>Pax Sale Motion</u>").²

PLEASE TAKE FURTHER NOTICE that, a proposed form of order granting the Pax Sale Motion (the "<u>Proposed Pax Order</u>") and the related asset purchase agreement (the "<u>Pax APA</u>") were attached to the Pax Sale Motion as Exhbits A and B, respectively.

PLEASE TAKE FURTHER NOTICE that counsel to the Debtors and Contura Energy, Inc. ("<u>Contura</u>") have since actively worked with counsel to the Official Committee of Unsecured Creditors (the "<u>Committee</u>") to address certain concerns of the Committee regarding the Pax Sale Motion, Proposed Pax Order and Pax APA.

PLEASE TAKE FURTHER NOTICE that, an amended order granting the Pax Sale Motion (the "<u>Amended Pax Order</u>") and an amended Pax APA (the "<u>Amended Pax APA</u>") are attached hereto as <u>Exhibit A</u> and <u>Exhibit B</u>, respectively. The modifications included in the Amended Pax Order and Amended Pax APA reflect an agreed upon resolution of the Committee's concerns among the Debtors, Contura and the Committee.

PLEASE TAKE FURTHER NOTICE that, for the convenience of the Court and parties in interest, redlines comparing the Amended Pax Order to the Proposed Pax Order and the Amended Pax APA to the Pax APA are attached hereto as **Exhibit C** and **Exhibit D**.

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: Blackjewel, L.L.C. (0823); Blackjewel Holdings L.L.C. (4745); Revelation Energy Holdings, LLC (8795); Revelation Management Corporation (8908); Revelation Energy, LLC (4605); Dominion Coal Corporation (2957); Harold Keene Coal Co. LLC (6749); Vansant Coal Corporation (2785); Lone Mountain Processing, LLC (0457); Powell Mountain Energy, LLC (1024); and Cumberland River Coal LLC (2213). The headquarters for each of the Debtors is located at 1051 Main Street, Milton, West Virginia 25541-1215.

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Pax Sale Motion.

DATED: August 28, 2019 **SUPPLE LAW OFFICE, PLLC**

Joe M. Supple, Bar. No. 8013 801 Viand St. Point Pleasant, WV 25550 Telephone: 304.675.6249

Facsimile: 304.675.4372 joe.supple@supplelaw.net

- and -

SQUIRE PATTON BOGGS (US) LLP

By: /s/ Stephen D. Lerner

Stephen D. Lerner (admitted *pro hac vice*)
Nava Hazan (admitted *pro hac vice*)
Travis A. McRoberts (admitted *pro hac vice*)
201 E. Fourth St., Suite 1900
Cincinnati, Ohio 45202
Telephone: 513.361.1200
Facsimile: 513.361.1201
stephen.lerner@squirepb.com
nava.hazan@squirepb.com

Co-Counsel to the Debtors and Debtors-in-Possession

travis.mcroberts@squirepb.com